

GIBSON, DUNN & CRUTCHER LLP

LAUREN R. GOLDMAN (*pro hac vice*)

lgoldman@gibsondunn.com

DARCY C. HARRIS (*pro hac vice*)

dharris@gibsondunn.com

200 Park Avenue

New York, NY 10166

Telephone: (212) 351-4000

Facsimile: (212) 351-4035

ELIZABETH K. MCCLOSKEY, SBN 268184

emccloskey@gibsondunn.com

ABIGAIL A. BARRERA, SBN 301746

abarrera@gibsondunn.com

One Embarcadero Center, Suite 2600

San Francisco, CA 94111

Telephone: (415) 393-8200

Facsimile: (415) 393-8306

NATALIE J. HAUSKNECHT (*pro hac vice*)

nhausknecht@gibsondunn.com

1900 Lawrence Street Suite 3000

Denver, CO 80202

Telephone: (303) 298-5783

Facsimile: (303) 313-2800

Attorneys for Defendant Meta Platforms, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

IN RE META PIXEL TAX FILINGS CASES

Case No. 5:22-cv-07557-PCP (VKD)

This Document Relates To:

Case No. 5:22-cv-07557-PCP, All Actions

**DEFENDANT META PLATFORMS, INC.'S
ADMINISTRATIVE MOTION TO CON-
SIDER WHETHER ANOTHER PARTY'S
MATERIAL SHOULD BE SEALED**

Date Action Filed: December 1, 2022
Honorable P. Casey Pitts

Defendant Meta Platforms, Inc. (“Meta”) certifies that it has reviewed and complied with the Court’s Standing Order on Administrative Motions to File Under Seal and Civil Local Rule 79-5. Pursuant to Civil Local Rule 79-5(f), and the Stipulated Protective Order entered by the Court on May 16, 2023 (ECF No. 73), Meta requests that the Court consider whether information designated by plaintiffs as Confidential should be sealed in connection with Meta’s Notice of Motion and Motion to Exclude the Testimony of Colin Weir and its exhibit (“Motion and Exhibit”).

Meta seeks consideration that portions of the Motion and Exhibit be filed under seal because they contain information designated as confidential by plaintiffs.

Document	Designating Party	Portion(s) to be Sealed
Notice of Motion and Motion to Exclude the Testimony of Colin Weir	Plaintiffs	Page 1, lines 7-11, 20-21, 27-28; page 2, lines 1-2; page 3, lines 8-11, 26-28; page 4, lines 2-6, 18-20.
Exhibit A	Plaintiffs	Entire Document.

RESPECTFULLY SUBMITTED AND DATED this 27th day of October, 2025.

Dated: October 27, 2025

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Lauren R. Goldman
Lauren R. Goldman

LAUREN R. GOLDMAN (admitted *pro hac vice*)
DARCY C. HARRIS (admitted *pro hac vice*)
lgoldman@gibsondunn.com
dharris@gibsondunn.com
200 Park Avenue
New York, NY 10166
Telephone: (212) 351-4000
Facsimile: (212) 351-4035

ELIZABETH K. MCCLOSKEY, SBN 268184
emccloskey@gibsondunn.com
ABIGAIL A. BARRERA, SBN 301746
abarrera@gibsondunn.com
One Embarcadero Center, Suite 2600
San Francisco, CA 94111

Telephone: (415) 393-8200
Facsimile: (415) 393-8306-

NATALIE J. HAUSKNECHT (pro hac vice)
nhausknecht@gibsondunn.com
1900 Lawrence Street Suite 3000
Denver, CO 80202
Telephone: (303) 298-5783
Facsimile: (303) 313-2800

Attorneys for Meta Platforms, Inc.